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PATENT APPLICATION

ATTORNEY DOCKET NO. 10005751-1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Raj Abhyanker

Confirmation No.: 5470

Application No.:09/809543

Examiner: Robert E. Rhode

Filing Date:

Mar 14, 2001

Group Art Unit: 3625

Title:

A Reverse Logistics Method For Recapturing Value Of Used Goods Over An Internet

Exchange Portals

Mail Stop Appeal Brief-Patents **Commissioner For Patents** PO Box 1450 Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Sir:

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on Sep. 16, 2004

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$340.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

` , ` , ' , ' , ' , ' , ' , ' , ' , ' ,	an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d months checked below:
() one month () two month () three mont () four month	\$ \$430.00 hs \$980.00
() The extension fee has	already been filled in this application.

() (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$340.00 . At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.

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Rev 10/04 (Aplbrief)

Respectfully submitted,

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:

Raj Abhyanker

Examiner: Robert E. Rhode

Serial No.:

09/809,543

Group Art Unit: 3625

Filed:

March 14, 2001

Docket No.: 10005751-1

Title:

A Reverse Logistics Method for Recapturing Value of Used Goods Over

Internet Exchange Portals

APPEAL BRIEF UNDER 37 C.F.R. § 41.37

Mail Stop Appeal Brief - Patents Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Sir:

This Appeal Brief is filed in response to the Final Office Action mailed July 2, 2004 and the Notice of Appeal filed on September 16, 2004.

AUTHORIZATION TO DEBIT ACCOUNT

It is believed that no extensions of time or fees for net addition of claims are required, beyond those, which may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required therefore (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's deposit account no. 08-2025.

REAL PARTY IN INTEREST

The real party-in-interest is the assignee, Hewlett-Packard Company, a Delaware corporation, having its principal place of business in Palo Alto, California.

RELATED APPEALS AND INTERFERENCES

There are no known related appeals or interferences known to appellant, the appellant's legal representative, or assignee that will directly affect or be directly affected by or have a bearing on the Appeal Board's decision in the pending appeal.

STATUS OF CLAIMS

Claims 1 - 32 stand finally rejected. No claims have been allowed. The final rejection of claims 1 - 32 is appealed.

STATUS OF AMENDMENTS

No claim amendments were filed subsequent to the Final Office Action. All claim amendments have been entered. The claims in the Appendix correspond to the claims on appeal.

SUMMARY OF CLAIMED SUBJECT MATTER

A summary of the clamed subject matter is provided below with reference numerals and references to the specification and drawings. The summary is set forth in three exemplary embodiments that correspond to independent claims 1, 17, and 25. Discussions about elements and recitations of claims 1, 17, and 25 can be found at least at the cited locations in the specification and drawings.

Claim 1

A method for reverse logistics, comprising (P. 12, lines 3-6: FIGS 3 & 4):

offering a right to market used goods, owned by an actual seller, for sale over an internet exchange portal, wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal (P. 13, line 10 – P. 14, line 6: FIG. 4, #404);

selecting at least one of the virtual sellers (P. 13, lines 13-14: FIG. 4, #406); selling the right to market the used goods to the at least one of the virtual sellers (P. 13, line 13 – P. 14, line 6: FIG. 4, #408);

marketing the used goods over the portal under direction of the at least one virtual seller (P. 13, line 19 – P. 14, line 6: FIG. 4, #408; and P. 15, lines 1 – 14: FIG. 4, #414); identifying an actual buyer (P. 15, line 15 – P. 16, line 3: FIG. 4, #416; and P. 16, lines 18 – 19); and

selling the used goods to the actual buyer (P. 16, lines 18 - 20: FIG. 4, #418).

Claim 17

A computer-usable medium embodying computer program code for commanding a computer to perform reverse logistics, comprising (P. 12, lines 3 - 6: FIGS. 3 & 4):

offering used goods, owned by an actual seller, for sale over an internet exchange portal (P. 13, line 10 – P. 14, line 6: FIG. 4, #404);

selling a right to market the used goods to a virtual seller, wherein the virtual seller is a manufacturer of new goods and the actual seller is a strategic account customer of the manufacturer (P. 13, line 13 – P. 14, line 6; P. 9, lines 8 – 15; and P. 12, lines 11 – 14);

marketing the used goods over the portal under direction of the virtual seller (P. 13, line 19 – P. 14, line 6: FIG. 4, #408; and P. 15, lines 1 – 14: FIG. 4, #414); identifying an actual buyer (P. 15, line 15 – P. 16, line 3: FIG. 4, #416; and P. 16, lines 18 – 19); and selling the used goods to the actual buyer (P. 16, lines 18 – 20: FIG. 4, #418).

Claim 25

A system for reverse logistics, comprising (P. 12, lines 3-6: FIGS 3 & 4): means for offering a right to market used goods, owned by an actual seller, for sale over an internet exchange portal, wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal (P. 13, line 10 – P. 14, line 6: FIG. 4, #404);

means for selecting at least one of the virtual sellers (P. 13, lines 13-14: FIG. 4, #406);

means for selling the right to market the used goods to the at least one of the virtual sellers (P. 13, line 13 – P. 14, line 6: FIG. 4, #408);

means for marketing the used goods over the portal under direction of the at least one virtual seller (P. 13, line 19 - P. 14, line 6: FIG. 4, #408; and P. 15, lines 1 - 14: FIG. 4, #414);

means for identifying an actual buyer (P. 15, line 15 – P. 16, line 3: FIG. 4, #416; and P. 16, lines 18 - 19); and

means for selling the used goods to the actual buyer (P. 16, lines 18 - 20: FIG. 4, #418).

GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

- (1) Claims 1-7, 11-13, 16, 17, 19-21, 24-30, and 32 are rejected under 35 USC § 103(a) as being unpatentable over "Surfing to Spark Market for Surplus Supplies," Susan E. Fisher (hereafter "Surplus") in view of Woolston (USPN 6,266,651).
- (2) Claims 8-10 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Hubbard (US 2001/0039497 A1, hereafter Hubbard).
- (3) Claims 14, 18, 22, and 30 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Shkedy (USPN 6,260,024, hereafter Shkedy).
- (4) Claims 15, 23, and 31 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Pallakoff (USPN 6,269,343, hereafter Pallakoff).

ARGUMENT

(1) Claims 1-7, 11-13, 16, 17, 19-21, 24-30, and 32 are rejected under 35 USC § 103(a) as being unpatentable over "Surfing to Spark Market for Surplus Supplies," Susan E. Fisher (hereafter "Surplus") in view of Woolston (USPN 6,266,651).

Sub-Heading I: (Claims 1-3, 6-7, 11-13, 16, 25, 28-30, 32: Claim 1 being representative)

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Applicants assert that the rejection does not satisfy these criteria.

Independent Claims 1 and 25

Applicants respectfully submit that the cited art does not teach or suggest each and every limitation of claims 1 and 25. Claim 1 is represented for argument.

Claim 1 recites a "method for **reverse logistics**." The Office Action **admits** that Surplus does not teach a reverse logistics method. (See Final OA, page 2). Applicants agree with this admission. The Office Action, however, states that this recitation is shown in Woolston. Applicants respectfully disagree.

Wooston teaches a network of consignment nodes. A user enters information about a good into a database and then offers the good for sale. (See example with Babe Ruth card at Col. 3, lines 53-67). By contrast, claim 1 recites a method for reverse logistics. The specification in Applicants' application provides a definition for reverse logistics: "Reverse logistics is herein defined as a process for consummating unwanted and/or obsolete used systems, devices, components, and parts back through supply chains" (Emphasis added: Applicants' specification at P. 12, lines 7-8). Woolston is completely silent on a process for consummating systems, devices, components, etc.

"back through supply chains."

For at least this reason, Applicants respectfully request allowance of claims 1 and 25 and the other noted claims.

Claim 1 also recites "offering a right to market used goods..., wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal." Surplus and Woolston, alone or in combination, fail to teach or suggest at least the noted recitation.

The Office Action **admits** that Surplus does not teach offering a right to market used goods, wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal. (See Final OA, page 2). Applicants agree with this admission. The Office Action, however, states that this recitation is shown in Woolston (Abstract and Col. 2, lines 30-54 and Figure 4). Applicants respectfully disagree.

In the Abstract, Woolston teaches a two-tier electronic market system. In this system, a retailer (first tier) provides the item(s) to a first participant (retail consumer). The retailer (first tier) also provides the item(s) to a second participant (wholesale dealer) in a second tier. The item or items are offered at different prices to the first and second participants. The specification (under "The Auction") explains how the items are sold:

The consignment node then checks whether the highest bid received is greater than the reserve price, if appropriate. The consignment node may then post **sold!** and the **sell price** to all participant terminals and proceed to post the next item for auction. (Col. 6, lines 46-50: Bold added).

Woolston thus teaches that a retailer can offer to sell an item or items to a plurality of participants (example, both consumers and wholesale dealers). By contrast, claims 1 recites offering a right to market used goods simultaneously to a plurality of different virtual sellers. Claim 1 then recites selecting at least one of the virtual sellers and then selling the right to market the used goods to the at least one virtual seller. In Woolston, once a participant is selected, the item or items are sold to the participant. In other words, if the retailer selects a consumer or a wholesale dealer, the item or items are then sold to the selected consumer or wholesale dealer. Woolston does not teach or

suggest that the retailer sells the right to market item or items to the consumer or wholesale dealer.

For at least this reason, Applicants respectfully request allowance of claims 1 and 25 and the other noted claims.

As noted, the Office Action also cites Col. 2, lines 30-54 of Woolston for teaching "offering a right to market used goods..., wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal." This section of Woolston teaches a network of consignment nodes.

Once a consignment node takes possession of a good, the good is presented to the market for sale. The sale of the good is clearly taught in Woolston:

By the interaction of a plurality of participants buying and selling collectibles on a consignment node, posting "buy at" and "sell at" quantities and prices the consignment node may establish a market or become a "market maker" for collectable goods. (Col. 3, lines 41-45).

In contrast to Woolston, claim 1 recites offering a right to market used goods simultaneously to a plurality of different virtual sellers. Woolston fails to teach or suggest this limitation.

Claims 2-16 depend from independent claim 1 and, hence, inherit all limitations of the base claim. Claims 26-32 depend from independent claim 25 and, hence, inherit all limitations of the base claim. Accordingly, a prima facie case of obviousness has not been established for claims 2-16 and 26-32 and other noted claims.

Sub-Heading II: (Claims 4-5, 17, 19-21, 24, 26-27: Claim 17 being representative)

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Applicants assert that the rejection does not satisfy these criteria.

Independent Claim 17

Applicants respectfully submit that the cited art does not teach or suggest each and every limitation of claim 17. Claim 17 recites a computer-usable medium embodying computer program code for commanding a computer to perform "reverse logistics." The Office Action admits that Surplus does not teach a reverse logistics. (See Final OA, page 2). Applicants agree with this admission. The Office Action, however, states that this recitation is shown in Woolston. Applicants respectfully disagree.

Wooston teaches a network of consignment nodes. A user enters information about a good into a database and then offers the good for sale. (See example with Babe Ruth card at Col. 3, lines 53-67). By contrast, claim 17 recites computer program code for commanding a computer to perform reverse logistics. The specification in Applicants' application provides a definition for reverse logistics: "Reverse logistics is herein defined as a process for consummating unwanted and/or obsolete used systems, devices, components, and parts **back through supply chains**" (Emphasis added: Applicants' specification at P. 12, lines 7-8). Woolston is completely silent on a process for consummating systems, devices, components, etc. "back through supply chains."

For at least this reason, Applicants respectfully request allowance of claim 17 and the other noted claims.

Claim 17 also recites "selling a right to market the used goods to a virtual seller, wherein the virtual seller is a manufacturer of new goods and the actual seller is a strategic account customer of the manufacturer."

Applicants respectfully requested the Examiner to cite a specific location in Surplus or Woolston that teaches or suggests this limitation. The Office Action simply cites Surplus pages 1 and 2 without further comment.

Applicants agree that Woolston is completely silent for teaching or suggesting the noted recitation. Applicants further agree that Surplus states:

Hewlett-Packard is selling Unix workstations, servers, and storage gear through ZoneTrader.com. The hardware includes goods that the computer manufacturer leased or distributed as demonstration models. (Page 2, last two sentences, continuing to page 3).

By contrast, claim 17 recites that the virtual seller is a manufacturer of new goods and the actual seller is a strategic account customer of the manufacturer. The specification in Applicants' application provides a definition for strategic account customer: "Actual sellers who regularly need to replace current capital assets are often labeled 'strategic-account customers' "(Applicants' specification at P. 12, lines 12-14). In Surplus, ZoneTrader is not a manufacturer of new goods with Hewlett-Packard being the strategic account customer of ZoneTrader.

For at least this reason, Applicants respectfully request allowance of claim 17 and the other noted claims.

Claims 18-24 depend from independent claim 17 and, hence, inherit all limitations of the base claim. Accordingly, a prima facie case of obviousness has not been established for claims 18-24.

(2) Claims 8-10 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Hubbard (US 2001/0039497 A1, hereafter Hubbard).

Dependent claims 8-10 indirectly depend from independent claim 1. As discussed above, claim 1 is patentable over Surplus and Woolston. Hubbard fails to cure the deficiencies of Surplus and Woolston in view of the limitations of independent claim 1. As such, dependent claims 8-10 are also allowable.

(3) Claims 14, 18, 22, and 30 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Shkedy (USPN 6,260,024, hereafter Shkedy).

Dependent claims 14, 18, 22, and 30 directly or indirectly depend from independent claims 1, 17, and 25, respectively. As discussed above, these independent claims are patentable over Surplus and Woolston. Shkedy fails to cure the deficiencies of Surplus and Woolston in view of the limitations of independent claims 1, 17, and 25. As such, dependent claims 14, 18, 22, and 30 are also allowable.

(4) Claims 15, 23, and 31 are rejected under 35 USC § 103(a) as being unpatentable over Surplus and Woolston in view of Pallakoff (USPN 6,269,343, hereafter Pallakoff).

Dependent claims 15, 23, and 31 directly or indirectly depend from independent claims 1, 17, and 25, respectively. As discussed above, these independent claims are patentable over Surplus and Woolston. Pallakoff fails to cure the deficiencies of Surplus and Woolston in view of the limitations of independent claims 1, 17, and 25. As such, dependent claims 15, 23, and 31 are also allowable.

CONCLUSION

In view of the above, Applicants respectfully request the Board of Appeals to reverse the Examiner's rejection of all pending claims 1-32.

Respectfully submitted,

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CERTIFICATE UNDER 37 C.F.R. 1.8: The undersigned hereby certifies that this paper or papers, as described herein, are being deposited in the United States Postal Service, as first class mail, in an envelope address to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this day of November 2004.

Name: Be Henry

CLAIMS APPENDIX

1. A method for reverse logistics, comprising:

offering a right to market used goods, owned by an actual seller, for sale over an internet exchange portal, wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal;

selecting at least one of the virtual sellers;

selling the right to market the used goods to the at least one of the virtual sellers;
marketing the used goods over the portal under direction of the at least one virtual seller;

identifying an actual buyer; and selling the used goods to the actual buyer.

- 2. The method of claim 1, wherein selling the right to market the used goods further comprises the actual seller and the at least one virtual seller entering into a contract.
- 3. The method of claim 1, wherein the actual seller, the plurality of virtual sellers, and the actual buyer register with the internet exchange portal.
- 4. The method of claim 1, wherein:

the at least one virtual seller is a manufacturer of new goods; and the actual seller is a strategic account customer of the manufacturer.

5. The method of claim 4, wherein the selling a right step further includes the step of:

charging the actual seller a lower price for acquiring the new goods in exchange for marketing the used goods.

- 6. The method of claim 1, wherein the marketing step includes the steps of: categorizing the used goods; and differentiating marketing by category.
- 7. The method of claim 6, wherein the categorizing step includes the step of: categorizing the used goods by their condition.
- 8. The method of claim 4, wherein the manufacturer offers new goods at a discount to the actual seller for granting the manufacturer the right to market the used goods.
- 9. The method of claim 4, wherein the manufacturer grants the actual seller credit for granting the manufacturer the right to market the used goods.
- 10. The method of claim 4, wherein the manufacturer offers the actual seller a rebate for granting the manufacturer the right to market the used goods.
- 11. The method of claim 6, wherein the categorizing step includes the step of: categorizing the used goods by functionality levels.
- 12. The method of claim 11, wherein the functionality levels include systems, devices,

components, parts, and materials.

13. The method of claim 6, wherein:

the marketing step includes the step of virtually differentiating a portion of the used goods into both a first category and a second category;

the identifying step includes the steps of,

receiving a first offer for the first category from a first actual buyer; and receiving a second offer for the second category from a second actual

wherein the second offer is of greater value than the first offer; and the selling the used goods step includes the step of selling the portion of used goods to the second actual buyer.

14. The method of claim 6, wherein:

buyer,

and

the marketing step includes the steps of,

virtually differentiating the used goods into a matrix of categories;

simultaneously marketing each of category in the matrix; and
the identifying step includes the step of receiving a set of offers for each of
category in the matrix; and

the selling the used goods step includes the step of accepting those offers which maximize value returned to the actual seller for the used goods.

15. The method of claim 6, wherein the marketing step includes the step of:

virtually aggregating the used goods from a first actual seller with other used goods from a second actual sellers into a matrix of categories;

the identifying step includes the step of receiving a set of offers for each of category in the matrix; and

the selling the used goods step includes the step of accepting those offers which maximize value returned to the first actual seller.

16. The method of claim 1, further including the steps of:

obtaining credit for a predetermined amount of funds from a creditor on behalf of the actual buyer; and

delaying payment of the funds from the creditor to the actual seller until after the actual buyer inspects and approves the used goods.

17. A computer-usable medium embodying computer program code for commanding a computer to perform reverse logistics, comprising:

offering used goods, owned by an actual seller, for sale over an internet exchange portal;

selling a right to market the used goods to a virtual seller, wherein the virtual seller is a manufacturer of new goods and the actual seller is a strategic account customer of the manufacturer;

marketing the used goods over the portal under direction of the virtual seller;

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identifying an actual buyer; and

selling the used goods to the actual buyer.

18. The computer-usable medium of claim 17, further comprising accepting a bid, by the

actual seller, from at least one of a plurality of virtual sellers to market the used goods

over the internet exchange portal.

19. The computer-usable medium of claim 17, wherein the selling a right step further

includes:

charging the actual seller a lower price for acquiring the new goods in exchange

for marketing the used goods.

20. The computer-usable medium of claim 17, wherein the marketing step includes the

steps of:

categorizing the used goods; and

differentiating marketing by category.

21. The computer-usable medium of claim 20, wherein:

the marketing step includes the step of virtually differentiating a portion of the

used goods into both a first category and a second category;

the identifying step includes the steps of,

receiving a first offer for the first category from a first actual buyer; and

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receiving a second offer for the second category from a second actual

buyer,

wherein the second offer is of greater value than the first offer; and

the selling the used goods step includes the step of selling the portion of used

goods to the second actual buyer.

22. The computer-usable medium of claim 20, wherein:

the marketing step includes the steps of,

virtually differentiating the used goods into a matrix of categories; and

simultaneously marketing each of category in the matrix; and

the identifying step includes the step of receiving a set of offers for each of

category in the matrix; and

the selling the used goods step includes the step of accepting those offers which

maximize value returned to the actual seller for the used goods.

23. The computer-usable medium of claim 20, wherein the marketing step includes the

step of:

virtually aggregating the used goods from a first actual seller with other used

goods from a second actual sellers into a matrix of categories;

the identifying step includes the step of receiving a set of offers for each of

category in the matrix; and

the selling the used goods step includes the step of accepting those offers which

maximize value returned to the first actual seller.

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24. The computer-usable medium of claim 17, further including the steps of:

obtaining credit for a predetermined amount of funds from a creditor on behalf of the actual buyer; and

delaying payment of the funds from the creditor to the actual seller until after the actual buyer inspects and approves the used goods.

25. A system for reverse logistics, comprising:

means for offering a right to market used goods, owned by an actual seller, for sale over an internet exchange portal, wherein the right to market the used goods is simultaneously provided to a plurality of different virtual sellers over the internet exchange portal;

means for selecting at least one of the virtual sellers;

means for selling the right to market the used goods to the at least one of the virtual sellers;

means for marketing the used goods over the portal under direction of the at least one virtual seller;

means for identifying an actual buyer; and means for selling the used goods to the actual buyer.

26. The system of claim 25, wherein:

the at least one virtual seller is a manufacturer of new goods; and

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the actual seller is a strategic account customer of the manufacturer.

27. The system of claim 26, wherein the means for selling a right further includes:

means for charging the actual seller a lower price for acquiring the new goods in exchange for marketing the used goods.

28. The system of claim 25, wherein the means for marketing includes:

means for categorizing the used goods; and

means for differentiating marketing by category.

29. The system of claim 28, wherein:

the means for marketing includes means for virtually differentiating a portion of the used goods into both a first category and a second category;

the means for identifying includes,

means for receiving a first offer for the first category from a first actual buyer; and

means for receiving a second offer for the second category from a second actual buyer,

wherein the second offer is of greater value than the first offer; and
the means for selling the used goods includes means for selling the portion of
used goods to the second actual buyer.

30. The system of claim 28, wherein:

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the means for marketing includes,

means for virtually differentiating the used goods into a matrix of categories; and

means for simultaneously marketing each of category in the matrix; and the means for identifying includes means for receiving a set of offers for each of category in the matrix; and

the means for selling the used goods includes means for accepting those offers which maximize value returned to the actual seller for the used goods.

31. The system of claim 28, wherein the means for marketing includes:

means for virtually aggregating the used goods from a first actual seller with other used goods from a second actual sellers into a matrix of categories;

the means for identifying includes means for receiving a set of offers for each of category in the matrix; and

the means for selling the used goods includes means for accepting those offers which maximize value returned to the first actual seller.

32. The system of claim 25, further including:

means for obtaining credit for a predetermined amount of funds from a creditor on behalf of the actual buyer; and

means for delaying payment of the funds from the creditor to the actual seller until after the actual buyer inspects and approves the used goods.